

1 The Rodriguez Law Group  
2 Ambrosio E. Rodriguez, SBN 200880  
3 626 Wilshire Blvd., Ste 460  
4 Los Angeles, CA 90017  
(213) 995-6767  
(213) 995-6368  
aer@aerlawgroup.com

5 Counsel for Defendant  
6 Anthony Flores  
7  
8

9 UNITED STATES DISTRICT COURT

10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANTHONY FLORES

15 Defendant.

16 Case No. 2:22-CR-00593-PA

17 EX PARTE REQUEST FOR CONTINUANCE  
OF THE SENTENCING DATE

18 **CURRENT SENTENCING**  
**DATE:** 02/26/2024

**[PROPOSED] SENTENCING**  
**DATE:** 05/20/2024

19 Before the Honorable Percy  
Anderson

20 **[UNOPPOSED BY THE GOVERNMENT]**

21 Defendant Anthony Flores ("Defendant"), both individually and by  
22 and through his counsel of record, Ambrosio E. Rodriguez, hereby  
23 requests this Court to continue his current sentencing date of  
24 February 26, 2024 to May 20, 2024. The basis for the request is as  
25 follows:

26 1. The indictment in this case was made public on January 31,  
27 2023. Defendant Flores first appeared before a judicial officer  
of the Court in which the charges in this case were pending on

1 March 13, 2023, at which point Mr. Flores was arraigned.

2 2. The Court set a trial date of May 9, 2023.

3 3. The trial date was later continued to March 19, 2024.

4 4. On October 19, 2023, a plea agreement was filed as to  
5 Defendant Anthony Flores.

6 5. On October 23, 2023, Mr. Flores pleaded guilty to Counts  
7 One, Three, Four, Five, Seven, Nine, Ten, Eleven, and Twelve of  
8 the Indictment, charging defendant with violations of 18 U.S.C.  
9 §1341, §1343, §1349, §1956(a)(1)(B)(i), and §1957. The Court  
10 accepted Mr. Flores's Change of Plea and vacated the pretrial  
11 conference and jury trial date. The Court set a Sentencing date  
12 for February 26, 2024, at 8:30 a.m.

13 6. Defense counsel and the Government have determined a  
14 mutually agreeable future date of May 20, 2024.

15 7. Defendant is requesting the sentencing date be continued  
16 based upon the following facts which defendant believes  
17 demonstrate good cause:

18 a. This is a very serious and factually intensive  
19 sentencing which includes significant mitigating  
20 circumstances pursuant to § 3553(a)(1) and will require  
21 extensive research, drafting, and review with the  
22 Defendant.

23 b. Specific to this matter and sentencing, the primary  
24 investigation relevant to these charges reside in the  
25 documents from a related civil case, which has generated  
26 tens of thousands of documents, hundreds of thousands of  
27 pages, and substantial deposition transcripts containing  
28 mitigating information relevant to sentencing, and  
organization and investigation will take significant

1 time when counsel is consumed with other preparation for  
2 other serious trials.

3 c. Specifically, defense counsel is engaged in multiple  
4 murder and sex crimes trials in California state court  
5 in the next three months:

6 1. People v. Anthony Varela (Los Angeles County Case  
7 No. VA151785, a multi-defendant murder case time  
8 estimated to last two weeks commencing in mid-January  
9 2024.

10 2. People v. Jobany Villatoro (Los Angeles County Case  
11 No. BA495274), a multi-victim murder case anticipated  
12 to commence on April 17, 2024, and anticipated to last  
13 two weeks;

14 3. People v. James Santistevan (LA County Case No.  
15 GA109936), a multi-defendant murder case anticipated  
16 to commence on April 4, 2024, time estimated for three  
17 weeks; and

18 4. People v. Sibghatallah Nawaz (San Diego County Case  
19 No. CD294384), a high-severity child molestation  
20 matter, is expected to commence in mid-April.

21 d. Additionally, counsel is expecting to be out of country  
22 on a long-planned family trip from March 15 through  
23 March 30, 2024.

24 e. The requested continuance is not based on congestion of  
25 the Court's calendar, or lack of diligent preparation on  
the part of the attorney for the government or the  
defense.

26 f. This is the first continuance request for sentencing on  
27 behalf of the defense.

1 g. Defense Counsel has conferred with Defendant regarding  
2 this request and proposed order thereon, and defendant  
3 agrees to the terms of the proposed order.

4 h. There would be no prejudice among parties caused by this  
5 continuance, and the Request is unopposed. On the  
6 contrary, a denial of continuance would result in direct  
7 and unquestionable prejudice on the Defendant, whose  
8 counsel would be deprived of necessary time to timely  
9 draft, file, and serve its Sentencing Position.

10 **CONCLUSION**

11 For the foregoing reasons, defendant Anthony Flores is  
12 requesting that his sentencing date be continued from February 26,  
13 2024 to May 20, 2024.

14 Dated: January 12, 2023

15 \_\_\_\_\_ /s/ Ambrosio E Rodriguez

16 Ambrosio E. Rodriguez

17 Attorney for Defendant